

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CARLSON INTERROGATORY DFC/USPS-19
(October 9, 2001)

DFC/USPS-19 was filed on May 25, 2001. The Postal Service is responding in accordance with the explanation provided in the Postal Service's Response to Presiding Officer's Ruling No. C2001-1/13, also filed today. The interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 9, 2001

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DFC/USPS-19. Please provide the following information, in files in Microsoft Excel or similar format, from the Collection Box Management System database for every collection box in the United States that is in the database: location ID number, box address, description of address, service class, type of box, area of box, posted weekday collection times, posted Saturday collection times, and posted holiday collection times.

RESPONSE:

In accordance with the conclusions stated in the Response of the United States Postal Service to Presiding Officer's Ruling No. C2001-1/13 (October 9, 2001), the Postal Service provides the information on the attached three sheets as its response to this question.

The first two sheets provide further quantification of the district-specific information already provided in USPS-LR-4 in this proceeding, as well as an aggregation of that information to the national level. Specifically, for the holiday eve collection adjustments identified by Mr. Carlson in his Motion to Compel a response to this question, these sheets further quantify the information reported for each such adjustment in LR-4 by restating the adjustment, and by providing the number of boxes affected by the adjustment, the total number of hours of advancement implied by the adjustment, and the average number of hours of advancement per affected box.

The adjustments are restated by indicating that the adjusted last pick up (LPU) was set either at a time certain, at the time posted for the LPU on Saturday, or advanced by a specific number of hours. The number of boxes affected (reported in the column under the heading "No. Boxes") was calculated by an examination of the CBMS database for the district or zone in question, and an identification of those boxes

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that would have had a later scheduled collection but for the adjustment. The total number of hours of advancement implied by the adjustment (reported in the column under the heading "Total Hours") was calculated by examining the CBMS database and determining the difference between the advanced scheduled collection time and the normal scheduled collection time for each affected box, and summing those differences across all affected boxes. Note that this calculation is based solely on differences in scheduled collection times; not actual collection times. Lastly, the average numbers of hours of advancement (reported in the column under the heading "Avg. Hours") is calculated by dividing the total hours of advancement by the number of affected boxes.

National Totals are provided at the bottom of the second sheet. For each holiday eve, they reflect the sum of the number of affected boxes and the total hours of advancement reported in each of the respective rows above, and the average advancement calculated by dividing the second of those total figures by the first. For July 3, 2000, the numbers are shown separately at the bottom of the second sheet because the figures for the only district reported to have advanced collections, New York, by definition also constitute the national totals for that date.

The third sheet lists the 3-digit ZIP Code areas which currently include at least one collection box with a posted holiday collection time, and the number of boxes with a posted holiday collection time found in each such 3-digit ZIP Code areas.

DISTRICT	12/24/1999 No. Boxes Total Hours Avg. Hours	12/31/1999 No. Boxes Total Hours Avg. Hours	12/24/1999 No. Boxes Total Hours Avg. Hours	12/31/1999 No. Boxes Total Hours Avg. Hours	12/23 & 12/30/2000 No. Boxes Total Hours Avg. Hours
SE New England	LPU -- One p.m. 2836 10553.34 3.72		LPU -- Noon 2994 13517.92 4.52		
SE NE (02903)		LPU -- One p.m. 171 659.75 3.86		LPU -- Noon 171 830.75 4.86	
Triboro	Sat. LPU 5252 13824.25 2.63	Sat. LPU 5252 13824.25 2.63		Sat. LPU 5252 13824.25 2.63	
Detroit	LPU -- Four p.m. 1446 1421.67 0.98				
Albany	LPU -- Noon 2176 9169.53 4.21		LPU -- Noon 2176 9169.53 4.21		
Boston	LPU -- Two p.m. 2645 7995.29 3.02	LPU -- Four p.m. 2536 2714.79 1.07	LPU -- Two p.m. 2645 7995.29 3.02	LPU -- Four p.m. 2536 2714.79 1.07	
Cap Metro	Sat. LPU 4834 7467.96 1.54		LPU -- Noon 2321 8741.23 3.77		
Baltimore	Sat. LPU 5068 8884.08 1.75		Sat. LPU 5068 8884.08 1.75		
No VA	Sat LPU 2424 4683.07 1.93		LPU -- Seven p.m. 34 49.25 1.45		
Houston	LPU -- Noon 3269 13658.69 4.18				
San Antonio 782	LPU -- One p.m. 1067 3609.05 3.38	LPU -- One p.m. 1067 3609.05 3.38	LPU -- One p.m. 1067 3609.05 3.38		
San Antonio 784	LPU -- Two p.m. 238 658.84 2.77		LPU -- Noon 242 1136.84 4.71		
San Antonio 7852	One hour early 18 18 1	One hour early 18 18 1			
San Antonio 78531			LPU -- Noon 7 25.66 3.67		
Middesex	LPU -- Noon 3425 14806.71 4.32		LPU -- Noon 3425 14806.71 4.32		
Dakotas	Two hours early 3080 6160 2		Two hours early 3080 6160 2		
Connecticut	LPU -- One p.m. 4022 11418 2.84		LPU -- Noon 4296 15669 3.65		
Northland	LPU -- Noon 5759 23624.75 4.1				
Royal Oak			LPU -- Noon 2333 9152.27 3.92	LPU -- Noon 2333 9152.27 3.92	LPU -- Noon 1556 4108.09 2.64

3-DIGIT ZIPS WITH POSTED HOLIDAY COLLECTION BOX PICKUPS

'041	9	520	22	936	6
'060	40	521	17	940	199
'061	3	522	24	941	136
'062	2	523	40	944	36
'064	46	525	25	949	151
171	4	526	24	950	25
195	2	527	5	954	77
224	1	532	11	955	72
256	4	543	2	967	166
370	1	592	5	968	379
371	2	597	7	969	19
385	1	599	1	970	67
390	26	600	5	971	49
391	27	604	22	972	85
392	1	605	177	973	43
396	1	610	4	974	47
420	24	612	24	975	47
421	33	613	24	976	33
423	9	615	3	977	26
424	20	617	128	978	35
456	5	618	2	979	7
461	5	619	29	986	46
462	16	625	16	995	85
465	16	626	40	997	68
467	1	627	65	999	23
469	25	640	1		4016
472	43	647	1		
473	2	667	2		
474	8	670	1		
475	1	671	1		
476	11	672	1		
478	1	674	37		
479	59	681	7		
481	1	712	1		
482	9	765	1		
483	4	766	16		
490	4	772	3		
492	1	779	34		
500	15	785	9		
501	5	797	7		
502	70	841	54		
503	174	873	29		
504	7	875	4		
505	13	880	57		
506	8	881	51		
508	17	882	75		
510	36	883	29		
512	9	884	15		
513	15	924	2		
514	19	932	73		

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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